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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

13 JESSE CRUZ, an Individual; MARIA CRUZ, an
14 Individual; GEOFANY MARTINEZ, an
Individual.

15 Plaintiffs,
16 vs.

17 DANNY DURBIN, an Individual; CHAMPION
18 TRANSPORTATION SERVICES, INC., a
19 foreign corporation; CHAMPION LOGISTICS
20 GROUP, INC., a foreign corporation; DOES I
through XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive.

Defendants.

CASE NO. 02:11-CV-00342-LDG-VCF

Consolidated with:
2:12-cv-0051-LDG-VCF
2:12-cv-01627-LDG-VCF

**STIPULATION AND ORDER TO
CONTINUE DEADLINE FOR RESPONSES
AND REPLIES TO DISPOSITIVE
MOTIONS
(First Request)**

AND ALL RELATED CASES

Pursuant to F.R.C.P. 6, and Local Rules 6-1, 6-2, and 7-1, the parties, by and through their undersigned attorneys of record, stipulate to a 10 day extension to the deadlines set for responding and replying to dispositive motions. The current response deadline is June 22, 2015; and the

1 deadline for replies is currently set for July 6, 2015. The proposed deadline for responses shall be
2 July 2, 2015; and the deadline for replies shall be extended to July 16, 2015.

3 All the remaining parties in this case have stipulated to the extension.

4 Pursuant to F.R.C.P. 6(b)(1), good cause exists for the extension because due to scheduling
5 conflicts with discovery in other cases, i.e. pre-scheduled depositions, a mediation, and a client
6 meeting involving out of state travel, attorneys for Champion and Mr. Durbin have been unable to
7 meet the current response deadline. Counsel for Champion has conferred with the remaining parties
8 in this case and none have objected to the extension.

9 In addition, there is no prejudice or any known conflict with potential trial dates.

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11 DATED this 22nd day of June, 2015.

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13 /s/ Michael Hottman
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19 *Attorneys for Danny Durbin and Champion
Transportation*
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DATED this 22nd day of June, 2015.

/s/ Craig A. Newby
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1 DATED this 22nd day of June, 2015.
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1 DATED this 22nd day of June, 2015.
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3 /s/ Ronald D. Rosengarten
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18 *Attorneys for Imperium Insurance*

13 **ORDER**

14 **It is so ordered.**

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17 DISTRICT COURT JUDGE
18 LLOYD D. GEORGE
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20 Dated: 25 June 2015
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